

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UMG RECORDINGS, INC., *et al.*,

Plaintiffs,

v.

KURBANOV, *et al.*,

Defendants.

Case No. 1:18-cv-00957-CMH-TCB

**CONSENT MOTION TO CORRECT NAME OF ONE PLAINTIFF
AND MEMORANDUM IN SUPPORT**

Hearing Waived

Pursuant to Local Civil Rule 7 and the Federal Rules of Civil Procedure, Plaintiffs hereby move, with Defendant Tofig Kurbanov's consent, for entry of an order changing the name of one plaintiff on the docket and in the case caption, and in support thereof, state as follows:

1. After filing this action, one of the plaintiffs changed its corporate name.
2. Plaintiff Warner Bros. Records Inc. is now Warner Records Inc.
3. Under Federal Rule of Civil Procedure 17(a)(1), an action must be prosecuted in the name of the real party in interest.
4. Plaintiffs' motion merely addresses an administrative matter and does not seek substantive relief. A motion to amend the caption is not, and does not require, a motion for leave to amend the complaint. *Woodard v. Tate & Kirlin Assoc.*, No. 1:08-CV-00416-CAM-LTW, 2008 WL 11470999, at *3 n.1 (N.D. Ga. Apr. 22, 2008); *Armstead v. Best Buy Stores, L.P.*, No. CV-06-118-FVS, 2006 WL 1455651, at *3 n.1 (E.D. Wash. May 22, 2006).

5. Accordingly, Plaintiffs respectfully request entry of an order directing the clerk to change the docket and case caption to reflect the new corporate name as follows:

a. Warner Records Inc. (f/k/a Warner Bros. Records Inc.)

6. Defendant Tofig Kurbanov consents to the relief requested in this motion.

Respectfully submitted,

Dated April 7, 2021

/s/ Scott A. Zebrak

Scott A. Zebrak (VSB No. 38729)

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2021, I electronically filed the foregoing with the Clerk using the CM/ECF system, which will send notification of such filing to counsel of record.

/s/ Scott A. Zebrak

Scott A. Zebrak